EXHIBIT E35

	Case 3:16-md-02738-	-MAS-RES Document 1	.0047-20	- Filed 06/17/19 - Page 2 of 5 f	agesD.
		84	0 78 ¹	APPEARANCES OF COUNSEL (Continue	ed)
			2		
			3	On behalf of the Defendant	
1	SUPERIOR COURT OF THE S		"	Chanel, Inc. (Weirick only):	
2	FOR THE COUNTY OF	LOS ANGELES	4	CHRISTOPHER O. MASSENBURG, Esq. Manion, Gaynor & Manning	
3	JOANNE ANDERSON and)	5	One Canal Place, Suite 3000	
4	GARY ANDERSON,	}	6	365 Canal Street	
5	Plaintiffs,)) Case No.		New Orleans, Louisiana 70130 cmassenburg@mgmlaw.com	
	vs.	j	7		
6	BORG-WARNER CORPORATION by) JCCP 5674/BC666513	8	On behalf of the Defendant	
7	its successor-in-interest BORG-WARNER MORSE TEC,	}	9	Honeywell International Inc., f/k/a AlliedSignal Inc., Successor-in-Interest to	
8	INC., et al.,			The Bendix Corporation (Anderson only):	
9	Defendants.	{	10	JESSICA J. THOMAS, Esq.	
10	CAROLVA UETRICK and FLVIRA	,	11	McDermott, Will & Emery, LLP	
11	CAROLYN WEIRICK and ELVIRA GRACIELA ESCUDERO LORA,	}	12	2049 Century Park East Suite 3800	
12	Plaintiffs,			Los Angeles, California 90067-3218	
13	vs.	Case No.	13	jthomas@mwe.com	
14	BRENNTAG NORTH AMERICA.	JCCP 4674/BC656425	14	(Appearance by telephone)	
	INC., etc., et al.,	}	15	VANDAD KHOSRAVIRAD, Esq.	
15	Defendants.	}	15	McDermott, Will & Emery, LLP 2049 Century Park East	
16)	16	Suite 3800	
17	DEPOSITIO	IN OF	17	Los Angeles, California 90067-3218 vkhosravirad@mwe.com	
18				(Appearance by telephone)	
19	WILLIAM E. LO		18		
20	March 29, 10:00 a.		19	On behalf of the Defendant	
21	11340 Lakefie		20	Borg Warner Morse TEC LLC (Anderson only):	
	Suite 2	200		KELVIN T. WYLES, Esq.	
22	Johns Creek,		21	Dentons US, LLP 601 South Figueroa Street	
23	Debra R. Luther, RMR Atlanta Report		22	Suite 2500	
24	Georgia Certified C (866) 344	ourt Reporters	23	Los Angeles, California 90017-5704 kelvin.wyles@dentons.com	
25	www.atlanta-repo			(Appearance by telephone)	
	22.		24		
	Atlanta Reporters, Inc. 866-344-0459	www.atlanta-reporters.com	25		
				Atlanta Reporters, Inc. www.atl	anta-reporters.com
1	APPEARANCES (OF COUNSEL	1	ADDEADANCES OF COUNSEL (Continue	4
2				APPEARANCES OF COUNSEL (Continue	su)
3	On behalf of the Plaintiffs:		2		
	CHRIS J. PANATIER, Esq.			On behalf of the Defendant	
4	Simon Greenstone Panatier Ba 3232 McKinney Avenue	rtlett, PC	3	Federal-Mogul Asbestos Personal Injury Trust a	s
5	Suite 610			Successor to Felt Products Manufacturing Comp	any
6	Dallas, Texas 75204 cpanatier@sgpblaw.com		4	(Anderson only):	
				, , , , , , , , , , , , , , , , , , , ,	
7				,	
•	STUART J. PURDY, Esq.	rtlett PC	5	HOLLY CHANG BEAL, Esq.	
8	STUART J. PURDY, Esq. Simon Greenstone Panatier Ba 3780 Kilroy Airport Way	rtlett, PC		,	
8	STUART J. PURDY, Esq. Simon Greenstone Panatier Ba 3780 Kilroy Airport Way Suite 540		5 6	HOLLY CHANG BEAL, Esq.	
8 9	STUART J. PURDY, Esq. Simon Greenstone Panatier Ba 3780 Kilroy Airport Way		6	HOLLY CHANG BEAL, Esq. Selman Breitman, LLP 6 Hutton Centre Drive Suite 110	
8	STUART J. PURDY, Esq. Simon Greenstone Panatier Ba 3780 Kilroy Airport Way Suite 540 Long Beach, California 90806			HOLLY CHANG BEAL, Esq. Selman Breitman, LLP 6 Hutton Centre Drive Suite 110 Santa Ana, California 92707	
8 9	STUART J. PURDY, Esq. Simon Greenstone Panatier Ba 3780 Kilroy Airport Way Suite 540 Long Beach, California 90806 spurdy@sgpblaw.com On behalf of the Defendant		6	HOLLY CHANG BEAL, Esq. Selman Breitman, LLP 6 Hutton Centre Drive Suite 110 Santa Ana, California 92707 hbeal@selmanlaw.com	
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(Case 3:1	L 6-md-0273	8-MAS-RLS	- Docum	ent 10047 84 0 79	-20	Filed 06/17/19 Page 3 of 5 PageID:
1		INDEX TO E	XAMINATIONS		04079	1	(Reporter disclosure made pursuant to
2						2	Article 10.B. of the Rules and Regulations of
3	<u>Exam</u>	<u>nination</u>	<u>Page</u>			3	the Board of Court Reporting of the Judicial
4					10:03:40	4	Council of Georgia.)
5	Examination	n by Mr. Bailey		7		5	WILLIAM E. LONGO, PhD,
6	Examination	n by Mr. Krasinski		93		6	having been first duly sworn, was examined and
7	Examinatio	n by Mr. Massenbur	g	154	10:04:03	7	testified as follows:
8					10:04:03	8	EXAMINATION
9			-		10:04:04	9	BY MR. BAILEY:
10					10:04:04	10	Q. Good morning, Dr. Longo.
11					10:04:11	11	A. Good morning, Mr. Bailey. How are you?
12					10:04:13	12	Q. I'm great. Thank you. I'm here for
13					10:04:15	13	Johnson & Johnson Consumer Products. I mentioned
14					10:04:18	14	that to you earlier; correct?
15					10:04:20	15	A. Yes, sir.
16					10:04:20	16	Q. I'm here to take your deposition in Joanne
17					10:04:22	17	Anderson and Carolyn Weirick. Do you understand
18					10:04:25	18	that?
19					10:04:25	19	A. I do.
20						20	
21					10:04:27	21	Q. Can you give me a little bit of
22					10:04:29		information about what preparation work you did,
23					10:04:32	22	let's take the Anderson case specifically, to prepare
23					10:04:35	23	for your deposition today?
					10:04:37	24	A. I read her three volumes of testimony
25	Atlanta Report	ers, Inc. 866-34		ta-reporters.com	10:04:45	25	is it three? I think it was three, either two or Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com
1		INDEX TO	EXHIBITS	6	10:04:47	1	8 three I have them and I read her husband's
2	Defendant's				10:04:50	2	testimony.
3	_Exhibit_	<u>Description</u>	<u>Page</u>		10:04:50	3	Q. About how much time do you think you have
4	1	Anderson deposition	on and trial	61	10:04:52	4	in preparing for that part of this deposition?
5		testimony			10:04:58	5	A. It was around 500, 600 pages. Somewhere
6 7	2	Cover letter of 3/1 subpoenas	14/2018 and	61	10:05:02	6	around seven to eight hours plus some brief
	3	Handwritten notes	by Longo for	63	10:05:06	7	calculations on potential amount of bottles she may
8		Anderson			10:05:11	8	have encountered during her children during
9	4	Handwritten notes Weirick	by Longo for	63	10:05:16	9	diapering and her bowling, maybe ten hours, eight to
10	5	Cover letter of 3/2	21/2018 from SGPB	63	10:05:23	10	ten, somewhere around there.
11		to Longo			10:05:24	11	Q. We'll set aside the fact that you have
12	6	Report of 2/8/201 J3 Resources	8 by Lee Poye of	66	10:05:26	12	examined two of the bottles that she provided to her
13	7	PowerPoint: Addin	a TEM to the	69	10:05:30	13	attorneys; correct?
14	•	Global Talc Specifi			10:05:30	14	A. Correct.
15	0	(McCarthy)	1072 ro. EDA	72	10:05:31	15	Q. Okay. So setting that time aside, have
16	8	call	1973 re: FDA phone	72	10:05:34	16	you done anything else to prepare for this part of
17	9	Longo file in Weiri	ck case	86	10:05:37	17	the deposition?
18	10	MAS Analyses on t	talc in Anderson	87	10:05:37		A. I mean, I went through a list of files or
19		case			10:05:44	19	studies and files and materials that I would be
20	11	ASTM D5755, Star for Microvacuum S	ndard Test Method Sampling and	121	10:05:44	20	relying on, just general overview, you know, another
21		Indirect Analysis of Transmission Elect	of Dust by			21	
		for Asbestos Struc			10:05:54		few hours.
22		Surface Loading			10:05:55	22	Q. Have you done any or made any attempt to
22					10:05:59	23	calculate any exposure levels that Ms. Anderson may
23			ning scanned copies				
		its 1 through 11 ha	ning scanned copies ave been attached t originals having bee	to the	10:06:02 10:06:05	24	have had as a result to any products in this case? A. I calculated out how many potential

1 nothing to do with my opinions. 1 and 2 Q. What are you expecting to find? I'm just 1 see 3 curious why you would do it if if doesn't change your 1 year 4 opinion. 1 see 4 Decause it's not ferro-anthophylite to the true 2 so 7 chemical formule of ferro-anthophylite to, so I just 1 see 8 want to be able to say that this is the percentage of 1 year 10 ferro-anthophylite to, so I just 1 see 8 want to be able to say that this is the percentage of 1 year 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 1 can find some. 1 anthophylite asbestos. 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. What test will you perform to come to that 1 anthophylite asbestos. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done. 1 and 2 Q. A well, it's already been done.		Case 3:16-md-02738-MAS-RLS Document 1		20	Filed 06/17/19 Page 4 of 5 PageID:
1 state 2	11:24:41 1	840		1 ,	
1 can find some. 2 deditional work on any samples that you've performed and some and some analysis, and I was looking for a good third-party lab. And I also heard that he was involved in the lambs of the samples that we didn't where we had enough material to do both PLM and Alamba Repoters. Inc. 86634-04598 www.atdrespoters.com 2 My plan would be to do all the additional and some something, since the find find the samples where we had enough material to do both PLM and Alamba Repoters. Inc. 86634-04598 www.atdrespoters.com 2 My plan would be to do all the additional ests on for the samples that are reflected in that study? 3 and be a third-party lab oth ep PLM and XRD. 4 be a third-party lab of the PLM and XRD. 5 C So that I don't miss something, since the find the samples where we had enough material that they need 6 to y G yrams to do both pLM and we had the material so we just took what we had on each of the samples where we had enough material that they need 6 to y G yrams to do both pLM and we had they need 6 to y G yrams to do both pLM and we had they need 6 to y G yrams to do both pLM and we had they need 6 to y G yrams to do both pLM and we had they need 6 to y G yrams to do both pLM and we had they need 6 to y G yrams to do both pLM and they need 6 to y G yrams to do b	_	, ,		_	•
1 1 1 1 1 1 1 1 1 1				_	•
1 A I just want to fully characterize it 1040 5 because it's not ferro-anthophyllite to the true 1040 7 chemical formula of ferro-anthophyllite, so I just 1040 7 chemical formula of ferro-anthophyllite, so I just 1040 9 iron versus when we don't have any jron in it versus 1040 10 ferro-anthophyllite type thing. It's still 10 ferro-anthophyllite subsetsos. 1040 11 anthophyllite asbestos. 1040 11 anthophyllite if	4			_	•
6 because it's not ferro-anthophyllite to the true 1348 7 chemical formula of ferro-anthophyllite, so I just 138 8 with the sist be percentage of 1399 9 iron versus when we don't have any iron in it versus 1390 10 ferro-anthophyllite absests. 1390 11 anthophyllite asbests. 1390 12 Q. What test will you perform to come to that 1390 13 conclusion? 1390 14 A. I may do some quantitative EDS and try to 1390 15 C. You have no intention of going back and 1390 16 I can find some. 1390 17 Q. You have no intention of going back and 1390 18 performing any PLM work on any of the samples you've 1390 19 done, is that true? 1390 20 A. Well, it's already been done. 1390 21 Q. Do you have any plans to perform any 1390 22 A. A. Well, it's already been done. 1390 22 A. A. Well, it's already been done. 1390 23 as may be a substantial to be a substantial to the substantial to	_	·		-	
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11:39:27 25 used the R-93 PLM method as well as the EPA the 11:53:51 25 which Mrs. Weirick actually used that type of	11:39:27 25	used the R-93 PLM method as well as the EPA the	11:53:51 2	5 v	which Mrs. Weirick actually used that type of
Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com		Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com		/	Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com

	Case 3:16-md-02/38-MAS-RLS - Document 1 (10047-20 Filed 06/17/19 Page 5 of 5 PageID:	
	190	LOO47-20 Filed 06/17/19 Page 5 of 5 Page(D: LOS1 1 DEPOSITION OF WILLIAM E. LONGO, PHD / DRL	
1	CERTIFICATE 040	· • • • • • • • • • • • • • • • • • • •	
2		2 I do hereby certify that I have read all	
2		questions propounded to me and all answers given by 3 me on the 29th day of March 2018, taken before	
3	STATE OF GEORGIA:	Debra R. Luther, and that:	
4	COUNTY OF GWINNETT:	1) There are no changes noted	
5		1) There are no changes noted. 5 2) The following changes are noted:	
		, ,	
6	I hereby certify that the foregoing	6 Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia	
7	transcript was taken down, as stated in the	7 Annotated 9-11-30(e), both of which read in part:	
8	caption, and the questions and answers thereto	Any changes in form or substance which you desire to	
9	were reduced to typewriting under my direction;	8 make shall be entered upon the depositionwith a statement of the reasons givenfor making them.	
-		9 Accordingly, to assist you in effecting corrections,	
10	that the foregoing pages 1 through 192 represent	please use the form below:	
11	a true, complete, and correct transcript of the	10	
12	evidence given upon said hearing, and I further	11 Page No Line No should read:	
13		12	
	certify that I am not of kin or counsel to the	Page No Line No should read:	
14	parties in the case; am not in the regular	13	
15	employ of counsel for any of said parties; nor	14 Page No Line No should read:	
16	am I in anywise interested in the result of said		
17		15	
	case.	Page No Line No should read: 16	
18	This, the 5th day of April 2018.		
19		17 Page No Line No should read:	
		18	
		Page No Line No should read:	
20		19	
	DEBRA R. LUTHER, B-881	20 Page No Line No should read:	
21	Georgia Certified Court Reporter		
	•	21 Page No Line No should read:	
		22	
22		23 Page No Line No should read:	
23		23 Page No Line No should read:	
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25		Page No Line No should read: 25	
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	Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com	Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com	
1	190 COURT REPORTER DISCLOSURE		
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1 2	COURT REPORTER DISCLOSURE	192	
2	COURT REPORTER DISCLOSURE Pursuant to Article 10.B. of the Rules and	192	
-	COURT REPORTER DISCLOSURE Pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the	192 1 DEPOSITION OF WILLIAM E. LONGO, PhD /DRL	
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